

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

EPIC SYSTEMS CORPORATION, a
Wisconsin Corporation,

Plaintiff,

Case No. 14-CV-748

v.

TATA CONSULTANCY SERVICES
LIMITED, an Indian Corporation; and TATA
AMERICA INTERNATIONAL
CORPORATION (dba TCS AMERICA), a
New York Corporation,

Defendants.

**PLAINTIFF'S NOTICE OF MOTION AND MOTION
FOR PARTIAL SUMMARY JUDGMENT**

Plaintiff Epic Systems Corporation ("Epic") hereby moves this Court, pursuant to Federal Rule of Civil Procedure 56(a), for partial summary judgment with respect to liability for Epic's First, Second, Fourth, and Fifth Causes of Action for (i) breach of contract; (ii) breach of the implied covenant of good faith and fair dealing; (iii) violation of the Wisconsin Computer Crimes Act; and (iv) violation of the Computer Fraud and Abuse Act.

Epic's motion for partial summary judgment is based on this Notice of Motion and Motion, the concurrently-submitted Memorandum in Support of Plaintiff's Motion for Partial Summary Judgment, Proposed Findings of Fact, and the evidentiary materials cited therein, any additional briefing on this subject, and the evidence and arguments that may be presented to the Court at a hearing on this matter.

Dated: November 16, 2015

/s/ Rick Richmond

Rick Richmond
rrichmond@jenner.com
Brent Caslin
bcaslin@jenner.com
Nick G. Saros
nsaros@jenner.com
Kate T. Spelman
kspelman@jenner.com
JENNER & BLOCK LLP
633 West 5th Street Suite 2600
Los Angeles, CA 90066
Tel.: 213-239-5100
Fax: 213-230-5199

Anthony A. Tomaselli
aat@quarles.com
Kristin G. Noel
kristin.noel@quarles.com
Stacy A. Alexejun
stacy.alexejun@quarles.com
QUARLES & BRADY LLP
33 East Main Street, Suite 900
Madison, WI 53703
Tel.: 608.251.5000
Fax: 608.251.9166

Attorneys for Plaintiff Epic Systems Corporation